



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SKW/NCG/GMR  
F. #2023R00922

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 14, 2025

By Email and ECF

Avraham C. Moskowitz, Esq.  
Moskowitz Colson Ginsberg & Schulman  
80 Broad Street, Suite 1900  
New York, NY 10004  
Email: amoskowitz@mcgsllp.com

Re: United States v. Asif Merchant  
Criminal Docket No. 24-362 (EK)

Dear Mr. Moskowitz:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being provided via USAfx, a file sharing platform. The government requests reciprocal discovery from the defendant.

The discovery is being produced pursuant to the Protective Order signed by counsel and entered by the Court on November 7, 2024. ECF No. 22.

The government is providing the following:

- Video footage provided by the Federal Bureau of Prisons, Bates-stamped AM\_004535;
- Records from a confidential human source, Bates-stamped AM\_004536 and marked as **Sensitive Discovery Material** pursuant to the Protective Order;
- Records provided by Meta, Inc, in response to a search warrant, Bates-stamped, AM\_004537;
- The above-referenced search warrant authorizing the search of a Meta account, Bates-stamped AM\_004538-AM\_004596.

You may examine the physical evidence discoverable under Rule 16, including original documents and electronic devices, by contacting the undersigned Assistant United States Attorneys to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.  
United States Attorney

By:                     /s/                      
Sara K. Winik  
Nina C. Gupta  
Gilbert M. Rein  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)